

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)

Plaintiff,)

v.)

LA WEIGHT LOSS,)

Defendant.)

Case No. WDQ-02-CV-648

PLAINTIFF EEOC'S MOTION FOR PROTECTIVE ORDER

Pursuant to the Federal Rule of Civil Procedure 26(c), Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) files the instant Motion for Protective Order (“Motion”). For the reasons set forth in the attached Memorandum in Support of the instant Motion, the EEOC respectfully requests that this Court enter an Order stating that EEOC is not required to provide a Fed. R. Civ. P. 30(b)(6) designee and to testify regarding the subject matter set forth in Defendant LA Weight Loss’s (“Defendant”) Notice of Deposition that Defendant served upon EEOC on March 13, 2006. Defendant noticed the deposition for March 24, 2006.

Rule 26(c) Certification

Plaintiff EEOC has conferred in good faith with Defendant in an attempt to resolve the parties' dispute regarding Defendant's Notice of Deposition for Rule 30(b)(6) testimony. EEOC stated its position to Defendant in a letter to Defendant's counsel. EEOC also spoke with Defendant's counsel via telephone conference held on March 20, 2006. During that call, EEOC

stated its legal position regarding the Notice and offered to supplement its Answers to certain Defendant Interrogatories in exchange for withdrawal of the Notice. However, the parties were unable to reach an agreement to resolve their dispute, thereby precipitating the instant Motion.

Respectfully submitted,

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

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/s/ _____
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Plaintiff EEOC's Motion for Protective Order, Memorandum in Support of Plaintiff EEOC's Motion for Protective Order, Index of Exhibits, and Exhibits 1-6 were served, via the Court's electronic filing system, upon Aliza R. Karetnick, Wolf, Block, Schorr & Solis-Cohen, LLP, 1650 Arch Street, 22nd Floor, Philadelphia, PA 19103-2097, on this day, the 22nd day of March 2006. The undersigned further certifies that a copy of the foregoing documents will be sent to Aliza R. Karetnick, Wolf, Block, Schorr & Solis-Cohen, LLP, 1650 Arch Street, 22nd Floor, Philadelphia, PA 19103-2097, on the 23rd day of March 2006.

/s/

RONALD L. PHILLIPS

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